

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

The State of Texas, et al.,

Plaintiffs,

v.

Google LLC,

Defendants.

Case No. 4:20-cv-00957-SDJ

Hon. Sean D. Jordan

Special Master: David T. Moran

UNOPPOSED MOTION TO FILE UNDER SEAL

Plaintiff States (“States”) respectfully move the Court for leave to file under seal: (a) the States’ Opening Brief to the Special Master for the March 21, 2024 Hearing (“Brief”) and (b) Exhibits 1 to 13 (the “Confidential Exhibits”) to their Brief. Consistent with Local Rule CV-5, the States will work with Google to file redacted versions—with as limited redactions as possible—of the Confidential Exhibits within seven (7) days. Defendant Google LLC (“Google”) does not oppose the States’ sealing request.

The States, with Google’s consent, request to file under seal their Brief and Confidential Exhibits because all contain discussions about and express references to **Google’s source code files, directories, and dashboards** that, according to Google, are not only nonpublic information but would also cause Google competitive harm if publicly disclosed. Google has advised the States that it intends to propose a public version of the brief and each of its exhibits with limited redactions to protect its source code and other highly confidential, competitively sensitive information.

For the reasons stated above, the States respectfully request that this Court allow the States to file the Confidential Exhibits under seal.

Dated: March 12, 2024.

Respectfully submitted,

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Submitted on behalf of all Plaintiff States

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CERTIFICATION OF CONFERENCE

I certify that counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and that Google LLC does not oppose the foregoing sealing request.

/s/ W. Mark Lanier
W. Mark Lanier

CERTIFICATE OF SERVICE

I certify that on March 12, 2024, this document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

/s/ W. Mark Lanier
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